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5 Attorney for Plaintiff

6
7 **UNITED STATES DISTRICT COURT**

8 **CLARK COUNTY, NEVADA**

9 HELEN ARMSTRONG

10 Plaintiff,

11 v.

12 TERRY REYNOLDS, in his individual capacity
13 and as Deputy Director of Nevada division of
Business and Industry; STEVE GEORGE, in his
14 individual capacity and as an administrator of the
Nevada Division of Industrial Relations; JESS
15 LANKFORD, in his individual capacity and as
Chief Administrative Officer of Nevada OSHA;
16 and LARA PELLEGRINI, in her individual
capacity and as Whistleblower Chief Investigator
17 of Nevada OSHA, DOES I through X, unknown
18 individuals, and ROES XI through XX, entities,
19 government agencies, corporations, or other
companies and/or businesses currently unknown;

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21 Defendants.

Case No.: 2:17-cv-02528

STIPULATION AND ORDER TO
CONTINUE DATE TO RESPOND TO
ANY MOTIONS FILED ON
NOVEMBER 16, 2017 OR SHORTLY
THEREAFTER BY ANY OF THE
DEFENDANTS
(First Request)

22 IT IS HEREBY STIPULATED AND AGREED between Defendants TERRY REYNOLDS,
23 Deputy Director of Nevada division of Business and Industry; STEVE GEORGE, Administrator of
24 the Nevada Division of Industrial Relations; JESS LANKFORD, Chief Administrative Officer of
25 Nevada OSHA; and LARA PELLEGRINI, Whistleblower Chief Investigator of Nevada OSHA, by
26 and through their counsel, Adam Paul Laxalt, Attorney General, and Deputy Attorney General
27 Vivienne Rakowsky, and Plaintiff HELEN ARMSTRONG, by and through her counsel, Joel F.
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1 Hansen of Cooper Levenson, P.A., that due to the fact that the Plaintiff's attorney, Joel F. Hansen,
2 Esq., will be having back surgery on November 16, 2017 and will be recuperating for an unknown
3 period of time, that the parties stipulate that should the Defendants file any motions in response to
4 the Complaint of the Plaintiff, that the Plaintiff's attorney, Joel F. Hansen, Esq., shall have until
5 January 5, 2018, to respond.
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7 Good cause exists to continue the date for the Plaintiff to respond to any motions which are
8 filed in response to the Complaint due to the upcoming surgery of counsel for the Plaintiff and this is
9 why the stipulation is entered into this 9th day of November, 2017.

10 COOPER LEVENSON, P.A.

ADAM PAUL LAXALT, *Attorney General*

11 /s/ Joel F. Hansen

/s/ Vivienne Rakowsky

12 _____
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Attorneys for Defendants

16 **ORDER**

17 IT IS SO ORDERED.

18 Dated: November 9, 2017.

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UNITED STATES DISTRICT COURT JUDGE